


Ashland Chemical
Drew Industrial Division

 Ashland Chemical, Inc.
 Subsidiary of
 Ashland Oil, Inc.

 Address Reply:
 305 Sunshine Road
 Kansas City, KS 66115
 Tel: (913) 621-6410
 Fax: (913) 621-7387

December 4, 1991

 Ms. Lynda Ramsey
 Kansas Bureau of Air and
 Waste Management
 808 West 24th Street
 Lawrence, KS 66046-4417

Dear Ms. Ramsey:

As requested in your November 26, 1991 Compliance Inspection report of my facility, I am writing to notify you of the "Resinew" and "Pentachlorophenate" waste disposition.

The seven (7) drums of Resinew, now classified "non-hazardous" will be shipped December 4, 1991 to El Dorado, Arkansas for incineration by Ensco.

There were three (3) drums of Pentachlorophenate waste instead of two (2). This material is being shipped December 4, 1991 to Clean Harbors of Natick, Inc., 10 Mercer Road, Natick, MA for storage until the Coffeyville, KS disposal site receives their EPA permit.

If you have any questions, please call me at (913) 621-6440.

Thank you.

Sincerely,

**DREW INDUSTRIAL DIVISION
 ASHLAND CHEMICAL, INC.**

 Wm. E. Dame
 Plant Manager

WED/js

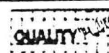
 cc: W. Dondarski, Jr. - Drew, Kearny, NJ
 K. Carter - Ashland, Dublin, OH

 R00146072
 RCRA RECORDS CENTER

 Headquarters
 One Drew Plaza
 Edmont, NJ 07005
 (201) 263-7600

 Telex: 136444
 Fax: (201) 263-3323

WD173


 Ashland Chemical's
 Commitment to
 Quality and Productivity

TO: Lyada Ramsey

FROM: Wm. E. Damm
DREW IND.

2 pages

12/4/91



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

Please print or type. (Form designed for use on slite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No	Manifest Document No	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <i>Olin Corporation</i> <i>P.O. Box 218</i> <i>Canaan, TN. 37310</i>		Pick up at: <i>Olin Water Service</i> <i>305 Sunshine Rd</i> <i>Kansas City, MO. 64115</i>		4. State Manifest Document Number <i>MA F370175</i>	
4. Generator's Phone () <i>615-226-4541</i>		5. US EPA ID Number <i>NA D039322250</i>		6. State Gen. ID <i>MA 95246</i>	
6. Transporter 1 Company Name <i>Clean Harbors of Kingston, Inc.</i>		7. US EPA ID Number <i>NA D980523203</i>		8. State Trans. ID <i>MA 95246</i>	
7. Transporter 2 Company Name		8. US EPA ID Number		9. State Trans. ID	
9. Designated Facility Name and Site Address <i>Clean Harbors of Natick, Inc.</i> <i>10 Mercer Road</i> <i>Natick, MA. 01760</i>		10. US EPA ID Number <i>NA D980523203</i>		4. Transporter's Phone ()	
				3. State Facility's ID Not Required	
				4. Facility's Phone () <i>508-655-8888</i>	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <i>RD, Hazardous Waste Solid, (F027)</i> <i>(Pentachlorophenolate) ORM-E NA 9189</i>		<i>3 DM</i>	<i>985</i>	<i>P</i>	<i>F027</i>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)		K. Handling Codes for Wastes Listed Above			
a.		a.			
b.		b.			
c.		c.			
d.		d.			
15. Special Handling Instructions and Additional Information <i>In case of emergency, call 1-800-OIL-TANK</i>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <i>William E. Dome</i>		Signature <i>William E. Dome</i>		Date <i>12/04/98</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Robert M. Caccamo</i>		Date <i>12/04/98</i>	
Printed/Typed Name <i>Robert M. Caccamo</i>		Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Date	

In case of emergency or spill, immediately call the National Response Center (800) 424-9303.

FAX COVER SHEET

TO Lynda Ramsey
AT KDHE

FROM A.E. Damm

AT DREW INDUSTRIAL DIV./ASHLAND CHEMICAL KANSAS CITY, KANSAS
TEL 913-621-6410 FAX 913-621-7387

NO. PAGES INCLUDING THIS COVER SHEET

2

COVER MESSAGE _____

Lynda - per our phone conv this AM
manifest 4/ Pentablorophenol

Thanks,
Bill 12/9/91



Drew Industrial Division

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
305 Sunshine Road
Kansas City, KS 66115
Tel: (913) 621-6410
Fax: (913) 621-7387

December 17, 1991

Ms. Lynda R. Ramsey
Kansas Bureau of Air &
Waste Management
Dept. of Health & Environment
808 West 24th Street
Lawrence, KS 66046-4417

RECEIVED
DEC 16 1991

RE: Ashland Chemical, Inc.
Drew Industrial Division
Kansas City Facility
KSD000203638
Notice of Violation

K. D. H. E.
NORTHEAST DISTRICT

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

Dear Ms. Ramsey:

This letter will constitute Ashland Chemical, Inc. Drew Industrial Division's response to the Notice of Violation received on November 30, 1991 for the Kansas City facility. The Notice was based on an inspection performed October 29, 1991.

RCRA STATUS

The Notice correctly states that the facility is considered a Small Quantity Generator; however, Ashland would like to additionally point out that on October 4, 1991, Ashland submitted Notification of Intent to Close and withdraw the Part B permit for the facility. Ashland received approval to initiate closure from the Bureau on October 14th. Following certification of closure, which Ashland expects to submit before the end of the year, Ashland will be a Small Quantity Generator only.

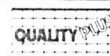
Item No. 1

Two drums of waste pentachlorophenolate located in your hazardous waste storage area marked with the incorrect waste identification code U242 in violation of K.A.R. 28-31-3.

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323

WD177



Ashland Chemical's
Commitment to
Quality and Productivity

Ashland Response:

Ashland respectfully disagrees that this is a violation of K.A.R. 28-31-3 since this references 40 CFR 261 which does not require that the waste code be marked on the container. The containers were in compliance since they were marked with the words "hazardous waste". The pentachlorophenolate material is the responsibility of Olin Corporation as dictated by Ashland acquisition documents. The material was classified by Olin as U242 originally since using the fact that it is the pure commercial chemical product containing sold active ingredient pentachlorophenol. EPA has since removed the waste code U242 and included them in the F027 designation. Ashland has relabeled the material as F027 and manifested the material on December 4th to Clean Harbors of Natick, Inc. located in Natick, Massachusetts.

Item No. 2:

Dwight Hammons has not received documented annual updated hazardous waste management training as required by Attachment III, Section four of the permit and 40 CFR 264.16.

Ashland Response:

Dwight Hammons received Annual RCRA Hazardous Waste Management Training on March 6, 1991 and October 8, 1991. Since Dwight is a laboratory employee there was confusion over who should maintain his training documentation. Documentation of this training is attached.

Item No. 3:

There is no manifest document number on the hazardous waste shipment dated Sept. 19, 1991 in violation of K.A.R. 28-31-4(d)(1).

Ashland Response:

The manifest in question was prepared by Olin personnel for the first shipment of waste material following the acquisition and as a result did not take into consideration Ashland's unique manifest numbering system. Ashland has assigned manifest number 00017 in our file copies.

Item No. 4:

The land disposal restriction notice dated September 19, 1991 identified the manifest document number as AR-518362. The manifest document number is incorrect and therefore in violation of K.A.R. 28-31-14.

Ashland Response:

Because Olin was unaware of Ashland's unique manifest numbering system, the state manifest document number was used instead. A notation has been made on the LDR form to reflect the newly assigned manifest document 00017.

Disposal of F027 Wastes

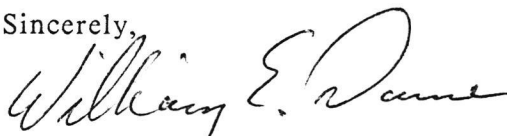
As described the December 4, 1991 letter, Olin manifested the three drums of pentachlorophenolate on December 4, 1991 to Clean Harbors of Natick, Inc. for on-site storage. The seven drums of Resinew waste were also shipped on December 4th to ENSCO for incineration.

Analysis of Wastes

Analysis for wastes identified as 21, 29, 33, 34, 35, 41, 42, 43 and the eight drums of Powder Blender Clean-Out Powder are attached. It should be noted that container 41 will be reused as Drew 3302 and three of the powders can be reworked (TH-2, TH-3, TH-7). Disposal arrangements are being made for the remaining materials.

If you have any questions, please contact me at (913) 621-6410.

Sincerely,



William E. Dame
Plant Manager

WED/js

bcc: W. Dondarski
A. Kolarsky
T. Woods
K. Carter
File: Drew Kansas City Waste

K.C. PLANT EMPLOYEE TRAINING RECORD

Employee Dwight Hammons Hire Date Sept. 15, 1974

<u>DATE</u>	<u>TRAINING - OSHA MANDATED</u>	<u>EMPLOYEE</u>	<u>INSTRUCTOR</u>
<u>10/8/91</u>	1. Confined Space Entry	<u>DH</u>	<u>DAME</u>
	2. Emergency Action Plan		
<u>10/8/91</u>	3. Forklift Driving	<u>DH</u>	<u>D. Selchan</u>
<u>10/8/91</u>	4. Hazard Communication		
	5. Emergency Response (HAZWOPER)	<u>DH</u>	<u>D. Selchan</u>
	6. Hearing Conservation		
<u>10/1/91</u>	7. Hot Work	<u>DH</u>	<u>FIREMASTER</u>
	8. Incipient Fire Training		
	9. Lock Out/Tag Out		
	10. OSHA Recordkeeping		
	11. Respiratory Protection		
	12. Toxic Substance Control Act (TSCA)		

<u>DATE</u>	<u>TRAINING - NON-OSHA MANDATED</u>	<u>EMPLOYEE</u>	<u>INSTRUCTOR</u>
<u>10/8/91</u>	1. Resource Conservation & Recovery Act (RCRA)	<u>DH</u>	<u>DAME</u>
<u>10/1/91</u>	2. Fire Extinguisher Training	<u>DH</u>	<u>FIREMASTER</u>
<u>3/6/91</u>	3. Hazardous Waste Training	<u>DH</u>	<u>DAME</u>
<u>3/6/91</u>	a. MSDS		
<u>3/6/91</u>	b. Hazards of Wastes		
<u>3/6/91</u>	c. Employee Safety		
<u>3/6/91</u>	d. Labeling/Marking Requirements		
<u>3/6/91</u>	e. Storage/Inspection		
<u>3/6/91</u>	f. Contingency Plan		
<u>10/8/91</u>	4. Plant Spill Procedure	<u>DH</u>	<u>DAME</u>



Department of Pollution Control and Ecology
P.O. Box 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Olin Water Services, Olin Corp. 3155 Fiberglass Rd. Kansas City, Kansas 66115		Note: Mailing address is: Olin Corp. P.O. Box 248, Charleston, TN 37312 Attn: John Marks		A. State Manifest Document Number AR- 518382	
4. Generator's Phone (913) 621-6410		B. State Generator's ID		C. State Transporter's ID	
5. Transporter 1 Company Name ENSCO, Inc.		6. US EPA ID Number AIRD01697481192		D. Transporter's Phone (501) 963-7173	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID	
9. Designated Facility Name and Site Address ENSCO, Inc. American Oil Road El Dorado, AR 71730		10. US EPA ID Number		F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (501) 963-7173	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
		No. Type		Unit. Waste No.	
a. "RQ", Hazardous Waste, Solid, N.O.S. (chrome contaminated wood), ORM-E, NA9199		0107 DM		16000 P D007	
b. "RQ", Waste Flammable Liquid, (Naphtha) Flammable liquid, UN 1993		0107 DM		1351010 P D001	
c. "RQ", Waste Flammable Liquid, Flammable liquid, (chloroform, Fuel oil), UN 1993		0101 DM		510 P D018	
d.					
14. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		EMERGENCY RESPONSE INFORMATION:	
11a. WMDS# 166217 11A-5,180#				Pat Chikungo - Olin Corp	
11b. WMDS# 166221 11B-3,508#				ph. - 1800-6546-911	
11c. WMDS# 166226 11C-91#					
If no alternate TSD, return to generator					
15. Special Handling Instructions and Additional Information		Load# 66520		Order# 72328	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name John Marks		Signature John Marks		Month Day Year 09/19/91	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Donnie McKinzie		Month Day Year 09/19/91	
Printed/Typed Name Donnie McKinzie		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name Beth Hooks		Signature Beth Hooks		Month Day Year 09/22/91	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

LAND DISPOSAL RESTRICTION NOTIFICATION FORM

SECTION I

Manifest No.: AR-518362 ⁰⁰¹⁷

Generator Name: Olin Water Services, Olin Corp.

WMDS No.(s): 166217, 166221, 166222

Address: 3155, Fairbanks Rd.

Completed By: John Marks

Kansas City, Kansas 66115

Title: Environmental Engr.

USEPA ID No.: 851000203635

Date: 9/19/91

(Continuation Sheets may be attached and must be numbered accordingly: Page of)

SECTION II

SPENT SOLVENT WASTES 40 CFR 268.30 AND CALIFORNIA LIST WASTES 40 CFR 268.32

(Check Here) ☐

A. Spent Solvent Wastes

The shipment, as referenced by the above manifest number, contains waste(s) corresponding to USEPA Hazardous Waste Code(s)

The above referenced waste(s) must be treated to meet the treatment standard expressed as Constituent Concentration in the Waste Extract as outlined in 40 CFR 268.41(a) Table CCWE and in 40 CFR 268.43(a) Table CCW below.

Table CCWE—Constituent Concentrations in Waste Extract

	Concentration (in mg/l)
FOU-PDS Spent Solvents	
Acetone	0.05
n-Butyl alcohol	5.0
Carbon disulfide	1.05
Carbon tetrachloride	.05
Chlorobenzene	.15
Cresols and cresylic acid	2.82
Cyclohexanone	.125
1,2-Dichlorobenzene	.85
Ethyl acetate	.05
Ethylbenzene	.05
Ethyl ether	.05
Hexanol	5.0
Methanol	.25
Methylene chloride	.20
Methylene chloride (from the pharmaceutical industry)	
Methyl ethyl ketone	12.7
Methyl isobutyl ketone	0.05
Nitrobenzene	0.05
Pyridine	0.85
Tetrachloroethylene	1.12
Toluene	0.075
1,1,1-Trichloroethane	1.12
1,1,2-Trichloro-1,2,2-Tetrafluoroethane	1.05
Trichloroethylene	
Trichlorofluoromethane	1.05
Xylenes	0.002
	0.05
	0.05

Table CCW—Constituent Concentrations in Waste

1,1,2-Trichloroethane	0.005	7.00
Benzene	0.070	3.70
Methylene Chloride (Pharmaceutical Industry)	0.44	9.00

FOU Spent Solvents 2,4-Dichlorobenzene and 2-Ethoxyethanol have treatment standards outlined in 40 CFR 268.42 and must be referenced in Section III of this form

☐ — If indicated by "X," any or all of the above specified waste codes are referenced to Certification Statement Section VI.

"X" here
INDICATION



Ashland Chemical

Drew Industrial Division

Ashland Chemical, Inc.
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Ashland Oil, Inc.

Address Reply:
305 Sunshine Road
Kansas City, KS 66115
Tel: (913) 621-6410
Fax: (913) 621-7387

December 4, 1991

Ms. Lynda Ramsey
Kansas Bureau of Air and
Waste Management
808 West 24th Street
Lawrence, KS 66046-4417

Dear Ms. Ramsey:

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There were three (3) drums of Pentachlorophenate waste instead of two (2). This material is being shipped December 4, 1991 to Clean Harbors of Natick, Inc., 10 Mercer Road, Natick, MA for storage until the Coffeyville, KS disposal site receives their EPA permit.

If you have any questions, please call me at (913) 621-6440.

Thank you.

Sincerely,

DREW INDUSTRIAL DIVISION
ASHLAND CHEMICAL, INC.


Wm. E. Dame
Plant Manager

WED/js

cc: W. Dondarski, Jr. - Drew, Kearny, NJ
K. Carter - Ashland, Dublin, OH

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323

WD173



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglass Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0238
Date Collected: --
Date Received: 10/28/91
Date Analyzed: 11/18/91
Analyst: *PRE* DH/js

1 - 91Q0238 DRUM #21

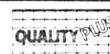
CONSTITUENT	expressed as mg/L	1
Specific Gravity	-	1.024
pH (neat)	units	6.5
Chromium	%CrO ₄	4.0
Zinc	%Zn	0.2

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



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Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0233
Date Collected: --
Date Received: 10/28/91
Date Analyzed: 11/18/91
Analyst: PRE DH/js

1 - 91Q0233 DRUM #29

CONSTITUENT	expressed as	l
Specific Gravity	-	1.004
pH (neat)	units	9.2
Chromium	%CrO ₄	0.5
Zinc	%Zn	<0.1

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
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Address Reply:
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Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0235
Date Collected: --
Date Received: 10/28/91
Date Analyzed: 11/14/91
Analyst: *PRE* DH/js

1 - 91Q0235 DRUM #33

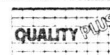
CONSTITUENT	expressed as mg/L	1
Specific Gravity	-	1.038
Chromium	%CrO ₄	0.26
Zinc	%Zn	0.1
pH (neat)	units	7.4

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
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Address Reply:
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Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0234
Date Collected: --
Date Received: 10/28/91
Date Analyzed: 11/18/91
Analyst: *PRE* DH/js

1 - 91Q0234 DRUM #34

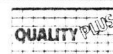
CONSTITUENT	expressed as	1
Specific Gravity	-	1.004
pH (neat)	units	10.7
Phosphate, Total	%PO ₄	1.4
Phosphate, Inorganic	%PO ₄	<0.1
Phosphate, Ortho	%PO ₄	<0.1
Polymer	%SSMA	<0.1
Chromium	%CrO ₄	0

B. Dame B. Whiles

LF

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(201) 263-7600

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Address Reply:
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Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0229
Date Collected: --
Date Received: 10/28/91
Date Analyzed: 11/14/91
Analyst: *PRE* DH/js

1 - 91Q0229 DRUM #35

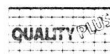
CONSTITUENT	expressed as mg/L	1
Specific Gravity	-	1.164
Chromium	%CrO ₄	0.5
Zinc	%Zn	0.1
pH (neat)	units	7.8
Phosphate, Total	%PO ₄	1.4

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0237
Date Collected: --
Date Received: 10/28/91
Date Analyzed: 11/15/91
Analyst: *PRE* DH/js

1 - 91Q0237 DRUM #41

CONSTITUENT	expressed as mg/L	1
Specific Gravity	-	1.152
pH (neat)	units	11.1
Disodium Ethylene Bisdithio- carbamate	%NABAM	15.0
Sodium Dimethyldithiocarbamate	-	15.0

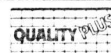
OLIN 3302

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

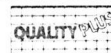
**Ashland Chemical****Drew Industrial Division**Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021Drew Industrial
Kansas City, KS**PRODUCT - SPECIAL ANALYSIS**
DATA ONLYLaboratory No.: 91Q0253
Date Collected: 10/28/91
Date Received: 10/28/91
Date Analyzed: 12/10/91
Analyst: *PRE* DH/js

1 - 91Q0253 DRUM #42

CONSTITUENT	expressed as mg/L	1
pH (neat)	units	8.9
Chemical Oxygen Demand	COD	59,000
Zinc	Zn	0.24
Copper	Cu	0.20
Nickel	Ni	<0.1
Chromium	Cr	<0.1
Lead	Pb	<0.1
Phenol	ϕ OH	317.0

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600Telex: 136444
Fax: (201) 263-3323Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

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Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0254
Date Collected: 10/28/91
Date Received: 10/28/91
Date Analyzed: 12/10/91
Analyst: *PRE* DH/js

1 - 91Q0254 DRUM #43

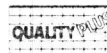
CONSTITUENT	expressed as mg/L	1
pH (neat)	units	9.7
Chemical Oxygen Demand	COD	710,000
Zinc	Zn	0.35
Copper	Cu	0.04
Nickel	Ni	<0.1
Chromium	Cr	0.34
Lead	Pb	<0.1
Phenol	ϕ OH	3550.0

B. Dame B. Whiles

LF

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Ashland Chemical's
Commitment to
Quality and Productivity



Drew Industrial Division

Ashland Chemical

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Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0203
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 11/18/91
Analyst: DH/js
PRECH

1 - 91Q0203 CLEAN OUT TH-1 04/15/87

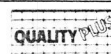
CONSTITUENT	expressed as mg/L	1
pH (0.1% solution)	units	2.4
Sulfate	%SO ₄	82.5
Phosphate, Total	%PO ₄	0.2
Sodium	%Na	17.0
Chelant	%Na ₄ EDTA	<0.1
Polymer	%PA	<0.1

B. Dame T. Hicks

LF

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Ashland Chemical's
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**Drew Industrial Division**

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Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0204
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 11/22/91
Analyst: DH/js

PRE DH

1 - 91Q0204 CLEAN OUT TH-2

CONSTITUENT	expressed as mg/L	1
Sulfite	%SO ₃	60.9
Tannin	%Tannin	3.0
Phosphate, Inorganic	%PO ₄	0.9

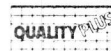
OLIN 4110

B. Dame T. Hicks

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
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Fax: (201) 263-3323



Ashland Chemical's
Commitment to
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**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0210
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 12/10/91
Analyst: *PRE* DH/js

1 - 91Q0210 TH3

CONSTITUENT	expressed as mg/L	1
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Polymer, Anionic

Allied Colloid's Percol

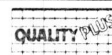
Unable to determine which Percol.

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0205
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 11/21/91
Analyst: DH/js

PRE DH

1 - 91Q0205 CLEAN OUT TH-4 04/15/88

CONSTITUENT	expressed as mg/L	1
pH (0.1% solution)	units	9.0
Phosphate, Inorganic	%PO ₄	2.0
Sulfate	%SO ₄	5.0
Sulfite	%SO ₃	58.4
Sodium	%Na	35.0

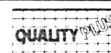
OLIN 1804 Waste

B. Dame T. Hicks

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0206
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 12/03/91
Analyst: DH/js

P&E O/L

1 - 91Q0206 CLEAN OUT TH-5 05/27/86

CONSTITUENT	expressed as mg/L	1
Sulfite	%SO ₃	58.3
Appearance	-	Dk. Brown Powder

Product is OLIN 4110 Waste

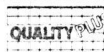
B. Dame

T. Hicks

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0207
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 12/04/91
Analyst: *PRE* *SA* DH/js

1 - 91Q0207 POWDER WASTE TH-6

CONSTITUENT	expressed as mg/L	1
Sulfite	%SO ₃	38.5
Appearance	-	Brown Powder

Product is OLIN 1804 Waste

B. Dame T. Hicks

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

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Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0211
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 12/10/91
Analyst: *TRE* DH/js

1 - 91Q0211 TH7

CONSTITUENT	expressed as mg/L	1
-------------	----------------------	---

Polymer, Anionic

Allied Colloid's Percol

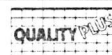
Unable to determine which Percol.

B. Dame B. Whiles

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity

**Drew Industrial Division**

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
3155 Fiberglas Road
Kansas City, KS 66115
Phone: (913) 621-2021

Drew Industrial
Kansas City, KS

PRODUCT - SPECIAL ANALYSIS
DATA ONLY

Laboratory No.: 91Q0209
Date Collected: 09/24/91
Date Received: 09/30/91
Date Analyzed: 12/03/91
Analyst: *PRE DH/js*

1 - 91Q0209 POWDER MIX TH-8

CONSTITUENT	expressed as mg/L	1
Sulfite	%SO ₃	58.1
Appearance	-	Off Gray

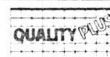
Product is OLIN 1803 Waste

B. Dame T. Hicks

LF

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323



Ashland Chemical's
Commitment to
Quality and Productivity



Drew Industrial Division



Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
305 Sunshine Road
Kansas City, KS 66115
Tel: (913) 621-6410
Fax: (913) 621-7387

December 4, 1991

RECEIVED

DEC 5 1991

Ms. Lynda Ramsey
Kansas Bureau of Air and
Waste Management
808 West 24th Street
Lawrence, KS 66046-4417

K. D. H. E.
NORTHEAST DISTRICT

Dear Ms. Ramsey:

As requested in your November 26, 1991 Compliance Inspection report of my facility, I am writing to notify you of the "Resinew" and "Pentachlorophenate" waste disposition.

The seven (7) drums of Resinew, now classified "non-hazardous" will be shipped December 4, 1991 to El Dorado, Arkansas for incineration by Ensco.

There were three (3) drums of Pentachlorophenate waste instead of two (2). This material is being shipped December 4, 1991 to Clean Harbors of Natick, Inc., 10 Mercer Road, Natick, MA for storage until the Coffeyville, KS disposal site receives their EPA permit.

If you have any questions, please call me at (913) 621-6440.

Thank you.

Sincerely,

DREW INDUSTRIAL DIVISION
ASHLAND CHEMICAL, INC.

Wm. E. Dame
Plant Manager

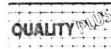
WED/js

cc: W. Dondarski, Jr. - Drew, Kearny, NJ
K. Carter - Ashland, Dublin, OH

Headquarters
One Drew Plaza
Boonton, N.J. 07005
(201) 263-7600

Telex: 136444
Fax: (201) 263-3323

WD173



Ashland Chemical's
Commitment to
Quality and Productivity

Ashland Chemical

Environmental, Health & Safety

G. W. Hammer
Vice President
(614) 889-3052

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
P.O. Box 2219
Columbus, Ohio 43216

November 19, 1991

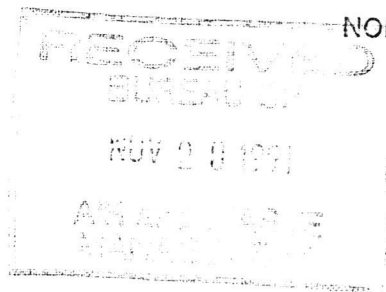
RECEIVED

NOV 27 1991

Mr. Curtis Lesslie
Kansas Bureau of Air and Waste Management
808 West 24th Street
Lawrence, KS 66046-4417

K. D. H. E.
NOT CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

RE: Ashland Chemical, Inc.
Drew Industrial Division
Kansas City Facility
KSD 000 203 638



Dear Mr. Lesslie:

This letter is in response to your discussion with Dan Bennewitz of Olin Chemicals on 11/14/91. The Department is requesting written confirmation that the Resinew is non-hazardous.

Ashland Chemical, Inc. acquired Olin Water Service's Kansas City facility on December 31, 1989. The purchase agreement included contractual language making Olin responsible for characterization and disposition of existing on-site materials. Olin has recently informed Ashland that the Resinew containing a 50/50 blend of Sodium Sulfite and Sodium Hydrosulfite (MSDS attached) is not a hazardous waste. It does not exhibit the characteristic of reactivity. Specifically, it does not react violently with water as evidenced by the fact that this is a water treatment chemical and water is the recommended extinguishing media. It is also not a sulfide bearing waste and contains only sulfite.

Ashland is finalizing arrangements with Olin for non-hazardous waste disposal of the seven drums of material. Please contact me at (913) 621-6410 if you have any questions.

Sincerely,

William E. Dame
Plant Manager

CC: Ms. Lynda Ramsey, Kansas Bureau of Air and Waste Management

Headquarters
5200 Blazer Parkway
Dublin, Ohio 43017

Cable Address: Aroplaz OH
Telex: 245385
Answerback: ASHCHEM
Fax: (614) 793-6080



Ashland Chemical's
Commitment to
Quality and Productivity

bcc: W. Dondarski

K. Woods

K. Carter

D. Bennewitz - Olin, P.O. Box 248 Lower River Rd, Charleston, TN 37310

A. Kolarsky/File: Drew/ Kansas City/ Waste

VI - TOXICOLOGY

DE NAME

OLIN RESINEW®

ACUTE ORAL LD₅₀ = No data for mixture

ACUTE DERMAL TOXICITY = No data for mixture

ACUTE INHALATION TOXICITY = No data for mixture

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE = None known

PRINCIPLE ROUTES OF ABSORPTION - Inhalation, dermal, eye, ingestion

RELEVANT SYMPTOMS OF EXPOSURE - Irritation to eyes, skin and mucous membranes. Gastrointestinal discomfort.

EFFECTS OF CHRONIC EXPOSURE - None known or reported.

CARCINOGENIC Not known to be.

MUTAGENIC Not known to be.

EYE IRRITATION Irritant

PRIMARY SKIN IRRITATION Irritant

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

VII - SPILL OR LEAK CONTROL PROCEDURES

Wear NIOSH/MSHA approved dust/mist respirator. Follow OSHA regulations for respirator use (See 29 CFR 1910.134). Wear goggles, impervious coveralls, gloves and boots. Remove all sources of ignition. Add non-combustible dry absorbent. Clean up and place in a DOT approved container. Allow to stabilize before sealing. Wash all contaminated clothing before reuse. In the event of a large spill, use the emergency telephone number shown on the front of this sheet.

WASTE DISPOSAL METHOD (FOLLOW ALL APPLICABLE LAWS & REGULATIONS - FEDERAL, STATE, & LOCAL)

Dispose of contaminated product, empty containers and materials used in cleaning up spills or leaks in a manner approved for this material. Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

VIII - REACTIVITY DATA

STABLE	X	UNSTABLE	N.A.	AT	N.A. ₂ F	N.A. ₂ C	HAZARDOUS REACTION OR POLYMERIZATION	MAY OCCUR	WILL NOT OCCUR	X
<p>CONDITIONS TO AVOID - Moisture, sparks, open flame.</p> <p>INCOMPATIBILITY (Material To Avoid) - Acids, organic or other readily oxidizable materials.</p> <p>HAZARDOUS DECOMPOSITION PRODUCTS - Sulfur dioxide</p> <p>HAZARDOUS MIXTURE OF OTHER LIQUIDS, SOLIDS, OR GASES - See Incompatibility</p>										

IX - PHYSICAL DATA

FREEZE POINT	ND °F	ND °C	SPECIFIC GRAVITY (H ₂ O = 1)	1.41	VOLATILES	None	WT. %
BOILING POINT	ND °F	ND °C	SOLUBILITY IN WATER	Appreciable	PH (1 % SOLUTION) =	7.8	
APPEARANCE	Cream colored powder				ODOR	Odorless	
CORROSIVE ACTION ON MATERIALS			OTHER				
AT 130° FOR 7 DAYS							
MILD STEEL (SAE 1020) =		ND	MPY				
ALUMINUM (7075-T6) =		ND	MPY				
STAINLESS STEEL (304) =		ND	MPY				

X - OTHER PRECAUTIONS

OSHA Classification: Flammable solid

TOXICOLOGY INFORMATION BY: S. J. Barbee, Ph.D.,
Toxicologist, Dept. of Environmental Hygiene & Toxicology
EMERGENCY PHONE: (203) 789-5435

OTHER INFORMATION BY: L. M. Prouty,
Regulatory Affairs Specialist,
Olin Water Services
EMERGENCY PHONE: 1-800-432-6546



Hazardous Waste Compliance Monitoring and Enforcement Log

RECEIVED
BUREAU OF
DEC 2 1991
A6 and VASTE

FORM
A

HANDLER

ID NUMBER: KSD0000203638

LDF () TSF (X) GEN () KG () SQ (X) TRA ()
HWM () HWB () UOM () UOB () NOT A GEN ()

HANDLER NAME: Ore Industries (Ashland Chemical)

AT MT CL 12-10-91
FT 12-10-91 RCRIS 12/10/91
Higgins 12-10-91

STREET: 3155 Filings

CITY: Kansas City

EVALUATION

New ☒ Followup ☐ Delete ☐ Verified in Records 1-10-92 - 11-26-91

Date 91 10 29 Agency S Type CEF Reason EO Person LRR District ☐

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other	
GER <u>EV</u>	GPT <input type="checkbox"/>	TGR <input type="checkbox"/>		DCH <u>ME</u>	DGW <u>ME</u>	DMC <u>ME</u>	DPP <u>ME</u>	CAS <input type="checkbox"/>	
GGR <input type="checkbox"/>	GRR <input type="checkbox"/>	TMR <input type="checkbox"/>		DCL <u>EV</u>	DIN <u>ME</u>	DMR <u>EV</u>	DSI <u>ME</u>	FEA <input type="checkbox"/>	
GLB <input type="checkbox"/>	GSC <input type="checkbox"/>	TOR <input type="checkbox"/>		DCP <u>EV</u>	DLB <u>EV</u>	DOR <u>ME</u>	DTR <u>ME</u>	ILD <input type="checkbox"/>	
GMR <input type="checkbox"/>	GSQ <input type="checkbox"/>	TRR <input type="checkbox"/>		DFR <u>ME</u>	DLF <u>ME</u>	DOT <u>ME</u>	DTT <u>ME</u>		
GOR <input type="checkbox"/>		TWD <input type="checkbox"/>		DGS <u>EV</u>	DLT <u>ME</u>	DPB <u>ME</u>	DWP <u>ME</u>		

COMMENTS

VIOLATION # 1

New ☒ Change ☐ Delete ☐

Link to:

Comments

Agency S Number 0005 Area GER Class 2 Priority ☐ Type SR

Regulation Citation: KAR 28-31-3

Date Determined

MM 10 DD 29 YY 91

Returned to Compliance

Scheduled:

MM 12 DD 30 YY 91

Actual:

☐ ☐ ☐

VIOLATION # 2

New ☒ Change ☐ Delete ☐

Link to:

Comments

Agency S Number 0005 Area DGS Class 1 Priority ☐ Type SR

Regulation Citation: personal training Sec. 4 of permit

Date Determined

MM 10 DD 29 YY 91

Returned to Compliance

Scheduled:

MM 12 DD 30 YY 91

Actual:

☐ ☐ ☐

VIOLATION # 3

New ☒ Change ☐ Delete ☐

Link to:

Comments

Agency S Number 0005 Area DMR Class 2 Priority ☐ Type SR

Regulation Citation: KAR 28-31-4(2)(1)

Date Determined

MM 10 DD 29 YY 91

Returned to Compliance

Scheduled:

MM 12 DD 30 YY 91

Actual:

☐ ☐ ☐

VIOLATION # 4

New ☒ Change ☐ Delete ☐

Link to:

Comments

Agency S Number 0005 Area DLB Class 2 Priority ☐ Type SR

Regulation Citation: KAR 28-31-4

Date Determined

MM 10 DD 29 YY 91

Returned to Compliance

Scheduled:

MM 12 DD 30 YY 91

Actual:

☐ ☐ ☐

Hazardous Waste Compliance Monitoring and Enforcement Log

FORM
B

ID Number:

Handler Name:

VIOLATION

Link to:

New ☐ Change ☐ Delete ☐

Comments ☐

Agency Number Area Class Priority Type

Regulation Citation:

Date Determined
MM DD YY

Returned to Compliance

Scheduled: MM DD YY
Actual:

VIOLATION

Link to:

New ☐ Change ☐ Delete ☐

Comments ☐

Agency Number Area Class Priority Type

Regulation Citation:

Date Determined
MM DD YY

Returned to Compliance

Scheduled: MM DD YY
Actual:

VIOLATION

Link to:

New ☐ Change ☐ Delete ☐

Comments ☐

Agency Number Area Class Priority Type

Regulation Citation:

Date Determined
MM DD YY

Returned to Compliance

Scheduled: MM DD YY
Actual:

VIOLATION

Link to:

New ☐ Change ☐ Delete ☐

Comments ☐

Agency Number Area Class Priority Type

Regulation Citation:

Date Determined
MM DD YY

Returned to Compliance

Scheduled: MM DD YY
Actual:

VIOLATION

Link to:

New ☐ Change ☐ Delete ☐

Comments ☐

Agency Number Area Class Priority Type

Regulation Citation:

Date Determined
MM DD YY

Returned to Compliance

Scheduled: MM DD YY
Actual:

VIOLATION

Link to:

New ☐ Change ☐ Delete ☐

Comments ☐

Agency Number Area Class Priority Type

Regulation Citation:

Date Determined
MM DD YY

Returned to Compliance

Scheduled: MM DD YY
Actual:

ENFORCEMENT

New ☒ Change ☐ Delete ☐

Date YY MM DD
9/11/96

Number

Agency S Type 120

District ME

Person LRA

COVERED VIOLATIONS

Link to:

Agency	Violation Number	Area
S	1	GG R?
S	2	AGS?
S	3	pm R
S	4	DLB

Agency	Violation Number	Area
S		
S		
S		
S		

Agency	Violation Number	Area
S		
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S		
S		

Comments: